LPDES PERMIT NO. LA0048704, AI No. 3424

LPDES STATEMENT OF BASIS
FOR THE DRAFT LOUISIANA POLLUTANT DISCHARGE ELIMINATION SYSTEM
(LPDES) PERMIT TO DISCHARGE TO WATERS OF LOUISIANA

I. **Company/Facility Name:** Bercen, Inc.; A Division of Cranston Print Works
Bercen Southern Division
30140 Eden Church Road
Denham Springs, LA 70726

II. **Issuing Office:** Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

III. **Prepared By:** Jenniffer Sheppard
Industrial Permits Section
Water Permits Division
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Date Prepared: February 5, 2009

IV. **Permit Action/Status:**

A. Reason For Permit Action:

Proposed reissuance of an existing Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term following regulations promulgated at LAC 33:IX.2711/40 CFR 122.46*.

LAC 33:IX Citations: Unless otherwise stated, citations to LAC 33:IX refer to promulgated regulations listed at Louisiana Administrative Code, Title 33, Part IX.

40 CFR Citations: Unless otherwise stated, citations to 40 CFR refer to promulgated regulations listed at Title 40, Code of Federal Regulations in accordance with the dates specified at LAC 33:IX.2301, 4901, and 4903.

B. NPDES permit - NPDES permit effective date: NA
NPDES permit expiration date: NA
EPA has not retained enforcement authority.

C. LPDES permit - Individual Permit - LA0048704
LPDES permit effective date: October 1, 2003.
LPDES permit expiration date: September 30, 2008.

Sanitary General Permit (Reissuance) - LAG532279
LPDES permit effective date: February 22, 2008.
LPDES permit expiration date: November 30, 2012.

D. Application received on March 31, 2008. A revised and updated application was received on July 11, 2008. Additional information received via e-mail on August 7, 2008, December 9, 2008, January 14, 2009, February 3, 2009, and February 10, 2009. Other additional information received was dated April 23, 2009.

V. **Facility Information:**

A. Location - 30140 Eden Church Road in Denham Springs

B. Applicant Activity -

According to the application, Bercen, Inc.; A Division of Cranston Print Works, Bercen Southern Division, is a chemical manufacturing facility that formulates and synthesizes FDA and non-FDA approved organic chemicals. The FDA chemicals, which are approved to come into contact with foods, include sizing agents, coating lubricants and resins for use in paper manufacturing.

C. Technology Basis - (40 CFR Chapter 1, Subchapter N/Parts 401, 405-415, and 417-471 have been adopted by reference at LAC 33:IX.4903)

Guideline	Reference
Organic Chemicals, Plastics, and Synthetic Fibers	40 CFR 414, Subparts E, H, and I

Process Flow - 0.007913 MGD

Other sources of technology based limits:
LDEQ Stormwater Guidance, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6).
Louisiana Water Quality Management Plan for Sanitary Dischargers.
LDEQ Sanitary General Permits
Best Professional Judgment

D. Fee Rate -
1. Fee Rating Facility Type: minor
2. Complexity Type: III, BPJ based on previous permit.

The Complexity of III was previously determined based on the size of the operation and relative low flow of the discharge.

3. Wastewater Type: II
4. SIC code: 2899

E. Continuous Facility Effluent Flow - 0.0180298 MGD.

Outfall 002 - 0.0086400 MGD
Outfall 003 - 0.0093898 MGD

VI. **Receiving Waters:** unnamed drainage ditch to Dixon Canal, thence to Gray's Creek and the Amite River

1. TSS (15%), mg/L: 6.05
2. Average Hardness, mg/L $CaCO_3$: 50.2
3. Critical Flow, cfs: 0.1
4. Mixing Zone Fraction: 1
5. Harmonic Mean Flow, cfs: 1.0
6. River Basin: Lake Pontchartrain, Segment No. 040304
7. Designated Uses:
   The designated uses are primary contact recreation, secondary contact recreation, and fish and wildlife propagation.

Information based on the following: LAC 33:IX Chapter 11. Hardness and 15% TSS data come from monitoring station 2615 (Gray's Creek at the bridge on Parish Road, 0.15 miles south of I-12, 0.8 miles east of LA Highway 16, and 2.0 miles south of Denham Springs)listed in Hardness and TSS Data for All LDEQ Ambient Stations for the Period of Record as of March 1998, LeBlanc. This information was presented in a memorandum from Todd Franklin to Jenniffer Sheppard dated September 16, 2008 (See Appendix C).

VII. **Outfall Information:**

Outfall 001

A. Type of wastewater - the intermittent discharge of treated sanitary wastewater.

B. Location - at the point of discharge from the sanitary treatment facility prior to combining with any other waters, at Latitude 30°29'15", Longitude 90°55'30".

C. Treatment - treatment of sanitary wastewaters consists of:
   - 2,000 GPD Mo-Dad sewage treament plant.

D. Flow - Intermittent, (estimated) 0.0007 MGD.

E. Receiving waters - unnamed drainage ditch along J.C. Summers Lane to Dixon Canal, thence to Gray's Creek and the Amite River.

F. Basin and segment - Lake Pontchartrain Basin, Segment 040304.

Outfall 002 (Interim and Final)

A. Type of wastewater - the continuous discharge of cooling tower blowdown.

B. Location - at the point of discharge to the stormwater drain located adjacent to the wastewater treatment plant, at Latitude 30°29'14", Longitude 90°55'30".

These wastewaters may be optionally routed for use as make-up water in the wastewater treatment system at Outfall 003.

C. Treatment - treatment of utility wastewaters consists of:
- chlorination (as needed).

D. Flow - Continuous, (Max 30-Day) 0.00864 MGD.

E. Receiving waters - unnamed drainage ditch along J.C. Summers Lane to Dixon Canal, thence to Gray's Creek and the Amite River.

F. Basin and segment - Lake Pontchartrain Basin, Segment 040304.

Outfall 003

A. Type of wastewater - the continuous discharge of treated process wastewater from areas 1 and 2, reactor boilout water, vacuum seal water, lab sink water, sanitary wastewater, utility wastewater including but not limited to boiler blowdown and vacuum system condensate, and optional use/discharge of makeup wastewaters from Outfalls 002, 005, and 006 as make-up water for the wastewater treatment system.

B. Location - at the point of discharge to the stormwater drain located adjacent to the wastewater treatment plant, prior to combining with any other waters, at Latitude 30°29'13", Longitude 90°55'27".

C. Treatment - treatment of process wastewaters consists of:
- pre-treatment through a DAF Unit.
- activated sludge.

D. Flow - Continuous Flow 0.0093898 MGD.

Process Wastewater*	0.007913 MGD
Utility Wastewater*	0.000360 MGD
Sanitary Wastewater*	0.001125 MGD

* Specific component waste streams are defined at Appendix A-1.

E. Receiving waters - unnamed drainage ditch along J.C. Summers Lane to Dixon Canal, thence to Gray's Creek and the Amite River..

F. Basin and segment - Lake Pontchartrain Basin, Segment 040304.

Outfall 005

A. Type of wastewater - the intermittent discharge of low contamination potential stormwater runoff and steam condensate from heat tracing.

B. Location - at the point of discharge from the sump prior to discharging to the storm drain adjacent to the wastewater treatment plant, prior to combining with any other waters, at Latitude 30°29'14", Longitude 90°55'26".

These wastewaters may be optionally routed for use as make-up water in the wastewater treatment system at Outfall 003.

C. Treatment - None.

D. Flow - Intermittent.

E. Receiving waters - unnamed drainage ditch along J.C. Summers Lane to Dixon Canal, thence to Gray's Creek and the Amite River.

F. Basin and segment - Lake Pontchartrain Basin, Segment 040304.

Outfall 006

A. Type of wastewater - the intermittent discharge of low contamination potential stormwater runoff and steam condensate from heat tracing.

B. Location - at the gate valve located at the south end of the pond, prior to combining with waters of the state,Latitude 30°29'12", Longitude 90°55'33".

These wastewaters may be optionally routed for use as make-up water in the wastewater treatment system at Outfall 003.

C. Treatment - None.

D. Flow - Intermittent.

E. Receiving waters - unnamed drainage ditch along J.C. Summers Lane to Dixon Canal, thence to Gray's Creek and the Amite River.

F. Basin and segment - Lake Pontchartrain Basin, Segment 040304.

VIII. Proposed Permit Limits:

The specific effluent limitations and/or conditions will be found in the draft permit. Development and calculation of permit limits are detailed in the Permit Limit Rationale section below.

Summary of Proposed Changes From the Current LPDES Permit:

A. Outfall 001 - newly created outfall. This outfall is currently covered under Schedule B of the LPDES Class I Sanitary General Permit, LAG532279. Upon reissuance of this permit, the Sanitary General Permit will be terminated. The proposed limitations/monitoring requirements in this permit are consistent with those previously established for Bercen, Inc. through their LPDES Class I Sanitary General Permit.

B. Outfall 001 - a 1/6 month monitor and report only requirement has been established for Sulfates and TDS due to these impairments being identified on the 2006 Integrated Report for Subsegment 040304. These requirements are established based on best professional judgment for data collection purposes and possible future TMDL development and are consistent with the Interim Schedules I and J of the Class I Sanitary General Permit, LAG530000, which addresses sulfate and TDS impaired streams.

C. Outfall 002 (Interim and Final)- the monitor and report requirement for Total Chromium has been removed. This parameter was previously established due to the possibility of corrosion inhibitor/additive use containing this pollutant. In a January 14, 2009 e-mail, Bercen indicated that they do not use treatments in their cooling towers. Additionally, the analytical data submitted with the application indicated that the levels of Total Chromium present in the discharge were 2 µg/L, which is well below the minimum quantification level (MQL) of 10 µg/L, which is further support for removal.

D. Outfall 002 (Interim and Final) - a prohibition against the use of additives and/or corrosion inhibitors containing any of the 126 priority pollutants has been added to this outfall. This has been established based on best professional judgment and is consistent with current guidance for these types of discharges.

E. Outfall 002(Interim and Final)- A water quality based effluent limitation has been established for Total Zinc using the guidance procedures presented in the Permitting Guidance Document for Implementing Louisiana Surface Water Quality Standards, LDEQ, April 16, 2008. The data used to screen this parameter against current water quality standards (90 µg/L) is the geometric mean of the analytical results provided to this Office in a December 9, 2008 e-mail.

In accordance with LAC 33:IX.2713.A, a three year compliance schedule has been established (Interim Schedule) and requires Bercen, Inc. to monitor and report the concentration of Total Zinc at Outfall 002. The three year schedule will allow the permittee time to investigate the source of the zinc contribution and provides sufficient time for Bercen, Inc. to come into compliance with the new water quality based effluent limitation. The Final Schedule is effective approximately three years after the permit effective date and includes a daily maximum Total Zinc limitation of 0.349 mg/L.

F. Outfall 002 (Interim and Final) and Outfall 003 - a 1/quarter monitor and report only requirement has been established for Sulfates and Total dissolved Solids (TDS) due to these impairments being identified on the 2006 Integrated Report of Impaired Waterbodies for Subsegment 040304. These requirements are established based on best professional judgment for data collection purposes and possible future TMDL development.

G. Outfall 003 - a permittee request to allow the use of the wastewaters from Outfalls 002, 005, and 006 as make-up water for the waste water treatment system has been granted. Additional OCPSF allocations have not been granted for this optional discharge at Outfall 003.

A reasonable potential analysis was performed on the discharges from Outfall 002 which resulted in the establishment of water quality-based limits for Total Zinc at this outfall. Since Bercen has indicated that the wastewater from Outfall 002 may be used as make-up water for the wastewater treatment system which provides treatment for the wastewater discharges from Outfall 003, this Office has determined that there is a reasonable potential for Total Zinc to be present in the Outfall 003 discharge at levels which may exceed the water quality standards. Therefore, in an effort to ensure protection of the receiving stream, monitoring requirements have been established for Total Zinc at Outfall 003. Additionally, a Part II requirement has been established requiring Bercen to submit a report containing a summary of two (2) years of Discharge Monitoring Report (DMR) data (24 samples) to the Office of Environmental Services within two (2) years and ninety (90) days after the effective date of the permit.

H. Outfall 003 - limitations were calculated in accordance with the OCPSF Guideline concentrations at 40 CFR Part 414, with 1% of the production covered under Subpart E for Thermosetting Resins and 99% covered under Subpart H for Specialty Organics. This renewal reflects an increase in process flow from the current LPDES permit, effective on October 1, 2003 from 0.007585 MGD to 0.007913 MGD. However, the overall flow at this outfall has decreased from 0.012045 MGD to 0.009398 MGD. The decrease in flow was due to the

removal of the cooling tower blowdown as a contributing source of utility wastewater at this outfall. The lower flow results in decreased BOD_5, TSS, and Ammonia (as N) limitations. The limitations for volatiles, acid compounds, and base neutral compounds remain unchanged from the current LPDES permit, effective on October 1, 2003.

I. Outfall 003 - monthly average limitations of 200 colonies/100 ml and daily maximum limitations of 400 colonies/100 ml for fecal coliform have been added to this outfall as a result of the pathogen indicator impairment listed on the 2006 Integrated Report of Impaired Waterbodies for Subsegment 040304. The sanitary flow makes up 11.9% of the total flow from this outfall. The limitations are established based on Best Professional Judgment are consistent with those established for a Schedule B of the Class I Sanitary General Permit, LAG530000. This information will be used for data collection purposes and possible future TMDL development. A monitoring frequency of 1/quarter has also been established based on Best Professional Judgment.

J. Outfall 004 - the wastewaters from this outfall were originally separated from Outfall 005 by a concrete berm, but have recently been combined to form a single outfall. Therefore, per the request of Bercen, Outfall 004 has been deleted and the Outfall 005 designation and limitations/monitoring requirements have been retained.

K. Outfalls 005 and 006 - a 1/quarter monitor and report only requirement has been established for Sulfates due to this impairment being identified on the 2006 Integrated Report of Impaired Waterbodies for Subsegment 040304. This requirement is established based on best professional judgment and may be used for data collection purposes and possible future TMDL development.

L. Outfalls 005 and 006 - a 1/quarter monitor and report only requirement has been established for Total Zinc at these outfalls based on the presence of elevated zinc levels, as seen in a December 9, 2008 e-mail to this Office containing analytical results. This determination was made based on best professional judgment.

IX. Permit Limit Rationale:

The following section sets forth the principal facts and the significant factual, legal, methodological, and policy questions considered in preparing the draft permit. Also set forth are any calculations or other explanations of the derivation of specific effluent limitations and conditions, including a citation to the applicable effluent limitation guideline or performance standard provisions as required under LAC 33:IX.2707/40 CFR Part 122.44 and reasons why they are applicable or an explanation of how the alternate effluent limitations were developed.

A. TECHNOLOGY-BASED VERSUS WATER QUALITY STANDARDS-BASED EFFLUENT LIMITATIONS AND CONDITIONS

Following regulations promulgated at LAC 33:IX.2707.L.2.b/40 CFR Part 122.44(l)(2)(ii), the draft permit limits are based on either technology-based effluent limits pursuant to LAC 33:IX.2707.A/40 CFR Part 122.44(a) or on State water quality standards and requirements pursuant to LAC 33:IX.2707.D/40 CFR Part 122.44(d), whichever are more stringent.

B. TECHNOLOGY-BASED EFFLUENT LIMITATIONS, CONDITIONS, AND MONITORING REQUIREMENTS

Regulations promulgated at LAC 33:IX.2707.A/40 CFR Part 122.44(a) require technology-based effluent limitations to be placed in LPDES permits based on effluent limitations guidelines where applicable, on BPJ (best professional judgment) in the absence of guidelines, or on a combination of the two. The following is a rationale for types of wastewaters. See outfall information descriptions for associated outfall(s) in Section VII. Regulations also require permits to establish monitoring requirements to yield data representative of the monitored activity [LAC 33:IX.2715/40 CFR 122.48(b)] and to assure compliance with permit limitations [LAC 33:IX.2707.I./40 CFR 122.44(I)].

1. Outfall 001 - Sanitary Wastewaters

***Outfall 001** - the intermittent discharge of treated sanitary wastewater.

Sanitary wastewaters (internal or external) are regulated in accordance with LAC 33:IX.711 or 709.B, by BPJ utilizing the sanitary general permits issued by this Office, and the Louisiana Water Quality Management Plan, Areawide Sanitary Effluent Limits Policy, Statewide Sanitary Effluent Limits Policy, and Secondary Treatment Standards for Sanitary Sewage, as applicable. Concentration limits are used in accordance with LAC 33:IX.2707.F.1.b which states that mass limitations

are not necessary when applicable standards and limitations are expressed in other units of measurement. LAC 33:IX.709.B references LAC 33:IX.711 which express BOD_5 and TSS in terms of concentration.

PARAMETER(S)	MASS, LBS/DAY unless otherwise stated		CONCENTRATION, MG/L unless otherwise stated		MEASUREMENT FREQUENCY
	MONTHLY AVERAGE	WEEKLY AVERAGE	MONTHLY AVERAGE	WEEKLY AVERAGE	
Flow, MGD	Report	Report	---	---	1/6 months
BOD_5	---	---	30	45	1/6 months
TSS	---	---	30	45	1/6 months
Fecal Coliform colonies/100ml	---	---	200	400(*1)	1/6 months
Solids, Total Dissolved (TDS)	---	---	---	Report(*1)	1/6 months
Sulfates	---	---	---	Report (*1)	1/6 months
pH Standard Units	---	---	6.0 (min)	9.0 (max)	1/6 months

(*1) Shall be reported as a daily maximum in lieu of a weekly average.

Site-Specific Considerations for Outfall 001

This is a newly created outfall. However, the outfall is currently covered under the LPDES Class I Sanitary General Permit, LAG532279. Upon issuance of this permit, the Sanitary General Permit will be terminated.

Please note, the limitations for this outfall are the same requirements as those established for Schedule B of the Sanitary General Permit. The limitations and frequencies in this schedule are consistent with this Office's current guidance on permitting sanitary wastewaters at industrial facilities. Additionally, the limitations are consistent with the requirements for the State's Areawide Policy for the Lake Pontchartrain Basin, Segment 0403, which requires that discharges less than 2,500 GPD not fall below the secondary treatment levels defined in LAC 33:IX.711.

Flow - this requirement has been established in accordance with LAC 33:IX.2707.I.1.b. The monitoring frequency of 1/6 months has been established in accordance with Schedule B of the Class I Sanitary General Permit, LAG530000.

BOD_5 and TSS - the monthly average and weekly average limitations are consistent with the requirements established in Schedule B of the Class I Sanitary General Permit, LAG530000 and the State's Areawide Policy for the Lake Pontchartrain Basin, Segment 0403, which requires that discharges less than 2,500 GPD not fall below the secondary treatment levels defined in LAC 33:IX.711. The monitoring frequency of 1/6 months has also been established in accordance with Schedule B of the General Permit.

Fecal Coliform - the monthly average and daily maximum limitations are consistent with the requirements established in Schedule B of the Class I Sanitary General Permit, LAG530000. The monitoring frequency of 1/6 months has also been established in accordance with Schedule B of the General Permit.

Sulfates and Total Dissolved Solids (TDS) - A 1/6 month monitor and report only requirement has been established for Sulfates and TDS due to these impairments being identified on the 2006 Integrated Report of Impaired Waterbodies for Subsegment 040304. These requirements are established based on best professional judgment for data collection purposes and possible future TMDL development and are consistent with the Interim Schedules I and J of the Class I Sanitary General Permit, LAG530000, which addresses Sulfate and TDS impaired streams.

pH - this requirement has been established in accordance with LAC 33:IX.1113.C.1 and is consistent with the requirements established in Schedule B of the Class I Sanitary General Permit, LAG530000. The monitoring frequency of 1/6 months has also been established in accordance with Schedule B of the General Permit.

2. Outfall 002 - Utility Wastewaters

*Outfall 002 (Interim and Final) - the continuous discharge of cooling tower blowdown.

Utility wastewaters including cooling tower blowdown being discharged to discrete outfalls receive BPJ limitations/monitoring requirements according to the following schedule:

PARAMETER(S)	MASS, LBS/DAY unless otherwise stated		CONCENTRATION, MG/L unless otherwise stated		MEASUREMENT FREQUENCY
	MONTHLY AVERAGE	DAILY MAXIMUM	MONTHLY AVERAGE	DAILY MAXIMUM	
Flow, MGD	Report	50,000	---	---	1/month
Oil & Grease	---	---	---	15	1/quarter
Chlorine, Total Residual	---	---	---	Report	1/quarter
Dissolved Solids, Total (TDS)	---	---	---	Report	1/quarter
Sulfates	---	---	---	Report	1/quarter
Temperature (°F)	---	90°	---	---	1/month
Zinc, Total	---	---	---	Report (*1)	1/quarter
				0.349 (*2)	
pH Standard Units	---	---	6.0 (min)	9.0 (max)	1/month

(*1) Report only requirement effective on the effective date of the permit and last until approximately three years from the effective date.

(*2) Daily maximum limitation effective three years after the effective date and last until permit expiration. This is a water quality based effluent limitation.

Site-Specific Considerations for Outfall 002 (Interim and Final)

Flow - this requirement has been established in accordance with LAC 33:IX.2707.I.1.b and has been retained from the current LPDES permit, effective on October 1, 2003. Please note that Bercen shall not exceed a maximum flow of 50,000 GPD. Should an increase in flow above this amount be planned in the future, Bercen must apply for and receive a major modification to incorporate additional requirements prior to discharging the additional flow. The monitoring frequency of 1/month has also been retained from the current LPDES permit.

Oil & Grease - a daily maximum limitation of 15 mg/L has been retained from the current LPDES permit, effective on October 1, 2003. This limitation has been established based on best professional judgment and is consistent with Schedule G in the Light Commercial General Permit, LAG480000 for discharges of cooling tower blowdown. The 1/quarter monitoring frequency has been also retained from the current LPDES permit.

Total Residual Chlorine (TRC) - a monitor and report only requirement has been retained from the current LPDES permit, effective on October 1, 2003 and is based on best professional judgment. The 1/quarter monitoring frequency has been also retained from the current LPDES permit.

Total Dissolved Solids (TDS) - a monitor and report only requirement has been retained from the current LPDES permit, effective on October 1, 2003 and is based on best professional judgment. The 1/quarter monitoring frequency has been also retained from the current LPDES permit. Additionally, TDS is listed as an impairment on the 2006 Integrated Report of Impaired Waterbodies for Subsegment 040304. Therefore, this information may be used for data collection purposes and possible future TMDL development.

Sulfates - a 1/quarter monitor and report only requirement has been established due to this impairment being identified on the 2006 Integrated Report of Impaired Waterbodies for Subsegment 040304. This requirement is established based on best professional judgment for data collection purposes and may be used for possible future TMDL development.

Temperature - a daily maximum limitation of 90°F has been retained from the current LPDES permit, effective on October 1, 2003. This limitation has been established based on best professional judgment and is consistent with Schedule F of the Light Commercial General Permit, LAG480000 for discharges of

cooling tower blowdown. The 1/month monitoring frequency has been also retained from the current LPDES permit and is consistent with the frequency established in the Light Commercial General Permit.

Total Zinc - a daily maximum water quality based effluent limitation has been established using the geometric mean of the analytical data presented in the December 9, 2008 e-mail correspondence and the guidance procedures presented in the Permitting Guidance Document for Implementing Louisiana Surface Water Quality Standards, LDEQ, April 16, 2008. This limitation shall become effective 3 years after the effective date of the permit in accordance with LAC 33:IX.2713.A. This will allow Bercen, Inc. time to investigate of the source of the zinc contribution and provides sufficient time to come into compliance with the new water quality based effluent limitation. Until that time, Bercen shall monitor and report only. The 1/quarter monitoring frequency has been retained from the current LPDES permit, effective on October 1, 2003. See Appendix B-1 for calculations and the Appendix B-3 for the water quality documentation package.

pH - this requirement has been established in accordance with LAC 33:IX.1113.C.1 and has been retained from the current LPDES permit, effective on October 1, 2003. The monitoring frequency of 1/month has also been retained from the current LPDES permit.

3. Outfall 003 - Process Wastewaters

*Outfall 003 - the continuous discharge of treated process wastewater from areas 1 and 2, reactor boilout water, vacuum seal water, lab sink water, sanitary wastewater, utility wastewater including but not limited to boiler blowdown and vacuum system condensate, and optional use/discharge of wastewaters from Outfalls 002, 005, and 006 as make-up water for the wastewater treatment system.

Bercen, Inc.; A Division of Cranston Print Works, Bercen Southern Division is subject to Best Practicable Control Technology Currently Available (BPT) and Best Available Technology Economically Achievable (BAT) effluent limitation guidelines listed below:

Manufacturing Operation	Guideline
Organic chemical manufacturing	40 CFR 414, Subparts E,H and I.

Subpart E = Thermosetting Resins makes up 1% of the production at Bercen, Inc.; A Division of Cranston Print Works, Bercen Southern Division.

Subpart H = Specialty Organic Chemicals makes up 99% of the production at Bercen, Inc.; A Division of Cranston Print Works, Bercen Southern Division.

Subpart I = Direct Discharge Point Sources That Use End-Of-Pipe Biological Treatment.

The following wastestreams and flows were used in limitation calculation:

Process	Flow, MGD
Reactor Boilout Water	0.000600
Vacuum Seal Water	0.005040
Lab Sink Water	0.000313
Process Area 1 SW	0.000040
Process Area 2 SW	0.000045
Vacuum System Condensate	0.001875
Total Process Flow	0.007913
Sanitary	
Total Sanitary Flow	0.001125
Utility	
Total Utility Flow (Boiler Blwdwn)	0.000360
Total Outfall Flow	0.009398

PARAMETER(S)	MASS, LBS/DAY unless otherwise stated		CONCENTRATION, MG/L unless otherwise stated		MEASUREMENT FREQUENCY
	MONTHLY AVERAGE	DAILY MAXIMUM	MONTHLY AVERAGE	DAILY MAXIMUM	
Flow, MGD	Report	Report	---	---	Continuous
pH (Standard Units)	---	---	6.0 (Min)	9.0 (Max)	1/week
BOD_5	3.30	8.46	---	---	1/week

PARAMETER(S)	MASS, LBS/DAY unless otherwise stated		CONCENTRATION, MG/L unless otherwise stated		MEASUREMENT FREQUENCY
	MONTHLY AVERAGE	DAILY MAXIMUM	MONTHLY AVERAGE	DAILY MAXIMUM	
TSS	4.09	12.66	---	---	1/week
Ammonia (as N)	0.31	0.63	---	---	1/week
Fecal Coliform colonies/100ml	---	---	200	400	1/quarter
Total Dissolved Solids (TDS)	---	Report	---	---	1/quarter
Sulfates	---	Report	---	---	1/quarter
Total Zinc	---	Report	---	---	1/month
Acrylonitrile	0.006	0.016	---	---	1/year
Benzene	0.002	0.009	---	---	1/year
Carbon Tetrachloride	0.001	0.003	---	---	1/year
Chlorobenzene	0.001	0.002	---	---	1/year
Chloroethane	0.007	0.018	---	---	1/year
Chloroform	0.001	0.003	---	---	1/year
1,1-Dichloroethane	0.001	0.004	---	---	1/year
1,2-Dichloroethane	0.004	0.014	---	---	1/year
1,1-Dichloroethylene	0.001	0.002	---	---	1/year
1,2-trans-Dichloroethylene	0.001	0.004	---	---	1/year
1,2-Dichloropropane	0.010	0.015	---	---	1/year
1,3-Dichloropropylyene	0.002	0.003	---	---	1/year
Ethylbenzene	0.002	0.007	---	---	1/year
Methyl Chloride	0.006	0.013	---	---	1/year
Methylene Chloride	0.003	0.006	---	---	1/year
Tetrachloroethylene	0.001	0.004	---	---	1/year

PARAMETER(S)	MASS, LBS/DAY unless otherwise stated		CONCENTRATION, MG/L unless otherwise stated		MEASUREMENT FREQUENCY
	MONTHLY AVERAGE	DAILY MAXIMUM	MONTHLY AVERAGE	DAILY MAXIMUM	
Toluene	0.002	0.005	---	---	1/year
1,1,1-Trichloroethane	0.001	0.004	---	---	1/year
1,1,2-Trichloroethane	0.001	0.004	---	---	1/year
Trichloroethylene	0.001	0.004	---	---	1/year
Vinyl Chloride	0.007	0.018	---	---	1/year
2-Chlorophenol	0.002	0.006	---	---	1/year
2,4-Dichlorophenol	0.003	0.007	---	---	1/year
2,4-Dimethylphenol	0.001	0.002	---	---	1/year
4,6-Dinitro-o-Cresol	0.005	0.018	---	---	1/year
2,4-Dinitrophenol	0.005	0.008	---	---	1/year
2-Nitrophenol	0.003	0.005	---	---	1/year
4-Nitrophenol	0.005	0.008	---	---	1/year
Phenol	0.001	0.002	---	---	1/year
Acenaphthene	0.001	0.004	---	---	1/year
Acenaphthylene	0.001	0.004	---	---	1/year
Anthracene	0.001	0.004	---	---	1/year
Benzo (a) anthracene	0.001	0.004	---	---	1/year
Benzo (a) pyrene	0.002	0.004	---	---	1/year
3,4-Benzofluoranthene	0.002	0.004	---	---	1/year
Benzo(k)fluoranthene	0.001	0.004	---	---	1/year
Bis(2-ethylhexyl)phthalate	0.007	0.018	---	---	1/year
Chrysene	0.001	0.004	---	---	1/year
1,2-Dichlorobenzene	0.005	0.011	---	---	1/year

PARAMETER(S)	MASS, LBS/DAY unless otherwise stated		CONCENTRATION, MG/L unless otherwise stated		MEASUREMENT FREQUENCY
	MONTHLY AVERAGE	DAILY MAXIMUM	MONTHLY AVERAGE	DAILY MAXIMUM	
1,3-Dichlorobenzene	0.002	0.003	---	---	1/year
1,4-Dichlorobenzene	0.001	0.002	---	---	1/year
Diethyl phthalate	0.005	0.013	---	---	1/year
Dimethyl phthalate	0.001	0.003	---	---	1/year
Di-n-butyl phthalate	0.002	0.004	---	---	1/year
2,4-Dinitrotoluene	0.007	0.019	---	---	1/year
2,6-Dinitrotoluene	0.017	0.042	---	---	1/year
Fluoranthene	0.002	0.004	---	---	1/year
Fluorene	0.001	0.004	---	---	1/year
Hexachlorobenzene	0.001	0.002	---	---	1/year
Hexachlorobutadiene	0.001	0.003	---	---	1/year
Hexachloroethane	0.001	0.004	---	---	1/year
Naphthalene	0.001	0.004	---	---	1/year
Nitrobenzene	0.002	0.004	---	---	1/year
Phenanthrene	0.001	0.004	---	---	1/year
Pyrene	0.002	0.004	---	---	1/year
1,2,4-Trichlorobenzene	0.004	0.009	---	---	1/year

(*1) Report only requirement effective on the effective date of the permit and last until approximately three years from the effective date.

(*2) Monthly average and daily maximum limitations effective three years after the effective date and last until permit expiration. These are water quality based effluent limitations.

Calculations and basis of permit limitations are found at Appendix A-1,B-2 and associated appendices. See below for site-specific considerations.

Site-Specific Considerations for Outfall 003

Flow - this requirement has been established in accordance with LAC 33:IX.2707.I.1.b and has been retained from the current LPDES permit, effective on October 1, 2003. The continuous monitoring frequency has also been retained from the current LPDES permit.

pH - this requirement has been established in accordance with LAC 33:IX.1113.C.1. and retained from the current LPDES permit effective on October 1, 2003. The 1/week monitoring frequency has also been retained from the current LPDES permit.

BOD_5 and TSS - monthly average and daily maximum limitations have been established in accordance with OCPSF Guidelines under 40 CFR 414, Subparts E and H with a process wastewater flow of 0.007913 MGD. Additionally, allocations have been granted for sanitary wastewater and utility wastewaters based on best professional judgment. Sanitary allocations are applied to a flow of 0.001125 MGD and based on a 30 mg/L monthly average concentration and 45 mg/L daily maximum concentration for BOD_5 and TSS. Utility wastewater allocations are applied to a flow of 0.00036 MGD and based on a 25% fraction of the total OCPSF weighted allocation (11.29 mg/L monthly average and 30.1075 mg/L daily maximum for BOD_5 and 14.275 mg/L monthly average and 45.8325 mg/L daily maximum for TSS). The methodology for calculation has been retained from the current LPDES permit, effective on October 1, 2003. The 1/week monitoring frequency has also been retained from the current LPDES permit.

Ammonia (as N) - monthly average and daily maximum limitations have been established based on the methodology of calculation from the current LPDES permit, effective on October 1, 2003. A monthly average concentration of 4.0 mg/L and daily maximum concentration of 8.0 mg/L has been applied to the total outfall flow of 0.009398 MGD based on best professional judgment and in accordance with the January 8, 2002 instream toxicity strategy related to the discharge of ammonia from Jack Ferguson (EPA Region VI) to Linda Levy (LDEQ). The 1/week monitoring frequency has also been retained from the current LPDES permit.

Fecal Coliform - fecal coliform limitations of 200 colonies/100 ml monthly average and 400 colonies/100 ml daily maximum have been added to this outfall as a result of the pathogen indicator impairment listed on the 2006 Integrated Report of Impaired Waterbodies for Subsegment 040304. The sanitary flow makes up 11.9% of the total flow from this

outfall. The limitations are established based on Best Professional Judgment are consistent with those established for a Class I Sanitary General Permit, LAG530000. This information will be used for data collection purposes and possible future TMDL development. A monitoring frequency of 1/quarter has also been established based on Best Professional Judgment.

Sulfates and Total Dissolved Solids (TDS) - a 1/quarter monitor and report only requirement has been established for sulfates and TDS due to these impairments being identified on the 2006 Integrated Report of Impaired Waterbodies for Subsegment 040304. These requirements are established based on best professional judgment for data collection purposes and may be used for possible future TMDL development.

Total Zinc - Bercen has indicated that the wastewater from Outfall 002 may be used as make-up water for the wastewater treatment system which provides treatment for the wastewater discharges from Outfall 003. A reasonable potential analysis was performed on the discharges from Outfall 002 which resulted in the establishment of water quality-based limits for Total Zinc at the outfall. Based on this information, this Office has determined that there is a reasonable potential for Total Zinc to be present in the Outfall 003 discharge at levels which may exceed the water quality standards. Therefore, in an effort to ensure protection of the receiving stream, monthly monitoring requirements have been established for Total Zinc at Outfall 003. Additionally, in accordance with Part II.J of the permit, Bercen shall submit a report containing a summary of two (2) years of Discharge Monitoring Report (DMR) data (24 samples) to the Office of Environmental Services within two (2) years and ninety (90) days after the effective date of the permit. Upon receipt and review of these results, this Office may reopen and modify, or alternatively, revoke and reissue this permit to include appropriate limitations for Total Zinc at Outfall 003. These requirements are established based on best professional judgment.

Acrylonitrile, Benzene, Carbon Tetrachloride, Chlorobenzene, Chloroethane, Chloroform, 1,1-Dichloroethane, 1,2-Dichloroethane, 1,1-Dichloroethylene, 1,2-trans-Dichloroethylene, 1,2-Dichloropropane, 1,3-Dichloropropylene, Ethylbenzene, Methyl Chloride, Methylene Chloride, Tetrachloroethylene, Toluene, 1,1,1-Trichloroethane, 1,1,2-Trichloroethane, Trichloroethylene, Vinyl Chloride, 2-Chlorophenol, 2,4-Dichlorophenol, 2,4-Dimethylphenol, 4,6-Dinitro-o-cresol, 2,4-Dinitrophenol, 2-Nitrophenol, 4-Nitrophenol, Phenol, Acenaphthene, Acenaphthylene, Anthracene, Benzo(a)anthracene, Benzo(a)pyrene, 3,4-Benzofluoranthene,

Benzo(k)fluoranthene, Bis(2-ethylhexyl)phthalate, Chrysene, 1,2-Dichlorobenzene, 1,3-Dichlorobenzene, 1,4-Dichlorobenzene, Diethyl phthalate, Dimethyl phthalate, Di-n-butyl phthalate, 2,4-Dinitrotoluene, 2,6-Dinitrotoluene, Fluoranthene, Fluorene, Hexachlorobenzene, Hexachlorobutadiene, Hexachloroethane, Naphthalene, Nitrobenzene, Phenanthrene, Pyrene, 1,2,4-Trichlorobenzene - limitations established in accordance with OCPSF Guidelines under 40 CFR 414, Subpart I for direct discharge point sources that use end-of-pipe biological treatment. A monitoring frequency of 1/year has been retained from the current LPDES permit effective on October 1, 2003. This frequency is appropriate since these pollutants are not expected to be on site.

4. Outfall(s) 005 and 006 - Stormwater

***Outfalls 005 and 006** - the intermittent discharge of low contamination potential stormwater runoff and steam condensate from heat tracing.

Uncontaminated or low potential contaminated stormwater discharged through discrete outfall(s) not associated with process wastewater shall receive the following BPJ limitations in accordance with this Office's guidance on stormwater, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6).

PARAMETER(S)	MASS, LBS/DAY unless otherwise stated		CONCENTRATION, MG/L unless otherwise stated		MEASUREMENT FREQUENCY
	MONTHLY AVERAGE	DAILY MAXIMUM	MONTHLY AVERAGE	DAILY MAXIMUM	
Flow, MGD	Report	Report	---	---	1/quarter
TOC	---	---	---	50	1/quarter
Oil & Grease	---	---	---	15	1/quarter
Sulfates	---	---	---	Report	1/quarter
Total Zinc	---	---	---	Report	1/quarter
pH Standard Units	---	---	6.0 (min)	9.0 (max)	1/quarter

Site-Specific Considerations for Outfall 005 and 006

Flow - this requirement has been established in accordance with LAC 33:IX.2707.I.1.b. This requirement has been retained from the current LPDES permit, effective on October 1, 2003, and is consistent with this Office's current guidance for stormwater discharges. The 1/quarter monitoring frequency has also been retained from the current LPDES permit.

TOC and Oil & Grease - a daily maximum limitation of 50 mg/L for TOC and 15 mg/L for Oil & Grease has been established and shall be monitored 1/quarter. These requirements have been retained from the current LPDES permit effective on October 1, 2003 and are consistent with current stormwater guidance for industrial facilities and the Multi-Sector General Permit, LAR050000.

Sulfates - a 1/quarter monitor and report only requirement has been established due to this impairment being identified on the 2006 Integrated Report of Impaired Waterbodies for Subsegment 040304. This requirement is established based on best professional judgment for data collection purposes and possible future TMDL development.

Total Zinc - monitor and report only requirements for Total Zinc have been established based on the presence of elevated zinc levels, as seen in a December 9, 2008 e-mail to this Office containing analytical results. This determination was made based on best professional judgment.

pH - this requirement has been established in accordance with LAC 33:IX.1113.C.1. This requirement has been retained from the current LPDES permit, effective on October 1, 2003, and is consistent with this Office's current guidance for stormwater discharges. The 1/quarter monitoring frequency has also been retained from the current LPDES permit.

Other Requirements Applicable to Stormwater

In accordance with LAC 33:IX.2707.I.3 and 4 [40 CFR 122.44(I)(3) and (4)], a Part II condition is proposed for applicability to all storm water discharges from the facility, either through permitted outfalls or through outfalls which are not listed in the permit or as sheet flow. **For first time permit issuance**, the Part II condition requires a Storm Water Pollution Prevention Plan (SWP3) within six (6) months of the effective date of the final permit. **For renewal permit issuance**, the Part II condition requires that the Storm Water Pollution Prevention Plan (SWP3) be reviewed and updated, if necessary, within six (6) months of the effective date of the final permit. If the permittee maintains other plans that

contain duplicative information, those plans could be incorporated by reference to the SWP3. Examples of these type plans include, but are not limited to: Spill Prevention Control and Countermeasures Plan (SPCC), Best Management Plan (BMP), Response Plans, etc. The conditions will be found in the draft permit. Including Best Management Practice (BMP) controls in the form of a SWP3 is consistent with other LPDES and EPA permits regulating similar discharges of stormwater associated with industrial activity, as defined in LAC 33:IX.2522.B.14 [40 CFR 122.26(b)(14)].

C. WATER QUALITY-BASED EFFLUENT LIMITATIONS

Technology-based effluent limitations and/or specific analytical results from the permittee's application were screened against state water quality numerical standard based limits by following guidance procedures established in the Permitting Guidance Document for Implementing Louisiana Surface Water Quality Standards, LDEQ, April 16, 2008. Calculations, results, and documentation are given in Appendix B.

In accordance with LAC 33:IX.2707.D.1/40 CFR § 122.44(d)(1), the existing (or potential) discharge (s) was evaluated in accordance with the Permitting Guidance Document for Implementing Louisiana Surface Water Quality Standards, LDEQ, April 16, 2008, to determine whether pollutants would be discharged "at a level which will cause, have the reasonable potential to cause, or contribute to an excursion above any state water quality standard." Calculations, results, and documentation are given in Appendix B.

The following pollutants received water quality based effluent limits:

POLLUTANT(S)
Total Zinc

Minimum quantification levels (MQL's) for state water quality numerical standards-based effluent limitations are set at the values listed in the Permitting Guidance Document for Implementing Louisiana Surface Water Quality Standards, LDEQ, April 16, 2008. They are also listed in Part II of the permit.

TMDL Waterbodies

EPA and LDEQ are in the process of developing Total Maximum Daily Loads (TMDLs) for the Lake Pontchartrain Basin. These TMDLs will attempt to determine the necessary effluent limitations to be placed in the identified point source discharge permits in order to improve water quality within the basin. In general, each TMDL will present several scenarios specific to the waterbody conditions and the respective dischargers in an attempt to balance water quality and economic impacts. It is anticipated that these TMDL projections will require more stringent effluent limitations for the identified point source dischargers within the basin.

In accordance with LAC 33:IX. 2707.D.6, LDEQ is required to ensure that LPDES permits are consistent with the Water Quality Management Plan (WQMP) as approved by EPA under §208(b) of the CWA. TMDLs upon finalization become part of Louisiana's WQMP and must be implemented into LPDES permits in accordance with WQMP, Volume 8, Appendix B.1.

In addition the Department continuously conducts ambient water quality monitoring throughout the state. It is possible that the list of impaired waterbodies within the basin will change, thus prompting the development of additional TMDLs.

Outfalls 001, 002, 003, 005, and 006

The discharges include treated sanitary wastewater (Outfall 001), cooling tower blowdown (Outfall 002), treated process wastewater from areas 1 and 2, reactor boilout water, vacuum seal water, lab sink water, sanitary wastewater, utility wastewater including but not limited to boiler blowdown and vacuum system condensate, and optional use/discharge of wastewaters from Outfalls 002, 005, and 006 as make-up water for the wastewater treatment system (Outfall 003), and stormwater and steam condensate from steam tracing area (Outfalls 005 and 006) are to an unnamed drainage ditch along J.C. Summers Lane to Dixon Canal, thence to Gray's Creek and the Amite River, Segment No. 040304. Gray's Creek is listed on the 303(d) report as being impaired with organic enrichment/low DO, pathogen indicators, nitrate/nitrite, sulfates, Total Dissolved Solids (TDS), and phosphorus. A TMDL is scheduled to be completed by March 2011-2012.

See discussions for each outfall below.

Outfall 001 TMDL Discussion

While this is a new discharge for the permit, the outfall itself is pre-existing and currently covered under Schedule B of the Class I Sanitary General Permit, LAG532279. Upon reissuance of this permit, the Sanitary General Permit will be terminated. The proposed limitations/monitoring requirements established in this permit are consistent with those previously established for Bercen, Inc. through their LPDES Class I Sanitary General Permit. The limitations imposed for the sanitary discharges are technology based effluent limits that have been scientifically developed by the EPA and the LDEQ and were used in the development of the LPDES Sanitary Class I General Permit, which currently covers more than fifteen hundred facilities statewide. These limits establish a minimum level of pollutant controls for all point source discharges of sanitary wastewaters to provide equity among these similar discharges throughout the state. Historically, LDEQ has found that discharges in compliance with the technology based limits for sanitary wastewater, such as those included in this permit, have not resulted in waterbodies being listed on the §303(d) list of impaired waterbodies, nor caused non compliance with designated uses.

Please note, the limitations for this outfall are the same requirements as those established for Schedule B of the Sanitary General Permit. The limitations and frequencies in this schedule are consistent with this Office's current guidance on permitting sanitary wastewaters at industrial facilities. Additionally, the limitations are consistent with the requirements for the State's Areawide Policy for the Lake Pontchartrain Basin, Segment 0403, which requires that discharges less than 2,500 GPD not fall below the secondary treatment levels defined in LAC 33:IX.711.

Organic Enrichment/Low DO, Nitrate/Nitrite, and Phosphorus

To address nutrient impairments to the receiving stream, BOD_5 limitations of 30 mg/L monthly average and 45 mg/L weekly average have been established for Outfall 001. Since BOD_5 can be used as a means to measure organic materials in a discharge and limitations consistent with those established in general permits have historically been considered protective of waters of the state, this Office has determined that discharge from this outfall should not cause or contribute to further nutrient impairments in the receiving stream. The monitoring frequency has been established at 1/6 months based on Best Professional Judgment and is consistent with Schedule B of the Class I Sanitary General Permit, LAG530000, and the requirements for the State's Areawide Policy for the Lake Pontchartrain Basin, Segment 0403, which requires that discharges less than 2,500 GPD not fall below the secondary treatment levels defined in LAC 33:IX.711.

Pathogen Indicators

Fecal coliform limitations of 200 colonies/100 ml monthly average

and 400 colonies per/100 ml daily maximum have been established to address the pathogen indicators impairment in the receiving stream. The monitoring frequency has been established at 1/6 months based on Best Professional Judgment and is consistent with Schedule B of the Class I Sanitary General Permit, LAG530000.

Sulfates and Total Dissolved Solids (TDS)
Monitor and reporting requirements have been established at this outfall for sulfates and TDS for information gathering purposes and possible future TMDL development. The monitoring frequency of 1/6 months has been established based on Best Professional Judgment and is consistent with the frequencies established for Interim Schedules I and J of the Class I Sanitary General Permit, LAG530000, which addresses sulfates and TDS impairments.

Outfall 002 TMDL Discussion
This outfall consists of cooling tower blowdown discharges only.

Organic Enrichment/Low DO, Nitrate/Nitrite, and Phosphorus
Based on the types of discharges from this outfall, these wastewaters do not have a history of causing or contributing to ambient DO and nutrient impairments. DO and nutrient impairments are typically attributed to improperly operated on-site domestic wastewater treatment systems, decentralized wastewater treatment, fill/drainage, crop production and unsewered residential districts. Therefore, no additional requirements were added to this outfall as a result of the nutrient impairments.

Pathogen Indicators
Fecal coliform is found in discharges of sanitary wastewater and is a common parameter used to identify the source of pathogen indicator impairments. Since there is no discharge of sanitary wastewaters into Outfall 002, LDEQ has determined that there is no reasonable potential that these discharges would cause further pathogen indicator impairments in the receiving waterbody. Therefore, no additional requirements were added to this outfall as a result of the pathogen indicator impairment.

Sulfates and Total Dissolved Solids (TDS)
Monitor and reporting requirements have been established at this outfall for Sulfates and TDS for information gathering purposes and possible future TMDL development. Monitoring has been established at 1/quarter based on Best Professional Judgment.

Outfall 003 TMDL Discussion

This outfall consists of discharges from treated process wastewater from areas 1 and 2, reactor boilout water, vacuum seal water, lab sink water, sanitary wastewater, utility wastewater including but not limited to boiler blowdown and vacuum system condensate, and optional use/discharge of wastewaters from Outfalls 002, 005, and 006 as make-up water for the wastewater treatment system.

Organic Enrichment/Low DO, Nitrate/Nitrite, and Phosphorus

In an effort to address the impairments during the development of the draft permit, BOD_5 monitoring has been identified as a means of measuring organic materials in a discharge. The BOD_5 limitations have been established in accordance with OCPSF Guidelines under 40 CFR 414, Subparts E and H. It should be noted that there was no net increase in the BOD_5 limitations from the current LPDES permit effective on October 1, 2003 to the proposed BOD_5 limitations in this draft. The monitoring frequency has been established for BOD_5 at 1/week. Additionally, a reopener clause has been established in the permit in accordance with LAC 33:IX.2903 which allows LDEQ to modify, or alternatively, revoke and reissue the permit to comply with any more stringent nutrient limitations or requirements that are promulgated in the future.

Pathogen Indicators

Fecal coliform is found in discharges of sanitary wastewater and is common parameter used to identify the source of pathogen indicator impairments. Sanitary flow makes up 11.9% of the total flow from Outfall 003. Therefore, fecal coliform limitations of 200 colonies/100 ml monthly average and 400 colonies/100 ml daily maximum have been added to this outfall. These limitations are established based on Best Professional Judgment and are consistent with those established for a Schedule B of the Class I Sanitary General Permit, LAG530000. This information will be used for data collection purposes and may be used for possible future TMDL development. A monitoring frequency of 1/quarter has also been established based on Best Professional Judgment.

Sulfates and Total Dissolved Solids (TDS)

Monitor and reporting requirements have been established at this outfall for sulfates and TDS for information gathering purposes and possible future TMDL development. Monitoring has been established at 1/quarter based on Best Professional Judgment.

Outfalls 005 and 006 TMDL Discussion

This outfall consists of stormwater and steam condensate from the steam tracing areas.

Organic Enrichment/Low DO, Nitrate/Nitrite, and Phosphorus

The types of wastewaters permitted to discharge from Outfalls 005 and 006 do not have a history of causing or contributing to ambient DO and nutrient impairments. DO and nutrient impairments are typically attributed to improperly operated on-site domestic wastewater treatment systems, decentralized wastewater treatment, fill/drainage, crop production and unsewered residential districts. Additionally, no LDEQ finalized TMDL recognizes non-process waste streams, such as those consisting mainly of stormwater, as point source contributors to DO and nutrient impairments where TMDLs have been established for these impairments.

However, in an effort to address the impairments during the development of the draft permit, TOC monitoring has been identified as a means of measuring organic materials in a discharge. Given the types of discharges and the suspected cause of the impairments, this Office has determined that it is appropriate to retain the 50 mg/L daily maximum limitation for TOC on these outfalls as an indicator parameter to monitor the organic constituents in the waste stream. The TOC limitation was originally established using stormwater guidance, in a letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6) and has been used in water discharge permits for similar types of discharges for 20 years and considered protective of waters of the state.

Pathogen Indicators

Fecal coliform is found in discharges of sanitary wastewater and is common parameter used to identify the source of pathogen indicator impairments. Since there is no discharge of sanitary wastewaters into Outfalls 005 and/or 006, LDEQ has determined that there is no reasonable potential that these discharges would cause further pathogen indicator impairments in the receiving waterbody. Therefore, no additional requirements were added to this outfall as a result of the pathogen indicator impairment.

Sulfates

Monitor and reporting requirements have been established at this outfall for sulfates for information gathering purposes and possible future TMDL development. Monitoring has been established at 1/quarter based on Best Professional Judgment.

Total Dissolved Solids (TDS)

TDS impairments were listed in the 2006 Final Integrated Report of Impaired Waterbodies for Subsegment 040304. Site clearance is associated with construction activities is typically the cause of TDS for stormwater discharges. Outfalls 005 and 006 are existing outfalls with no areas under construction and/or significant requested changes from the current LPDES permit, effective on October 1, 2003. Therefore, these discharges are not reasonably expected to cause or contribute to further TDS impairments. No additional requirements have been added to this outfall.

Monitoring frequencies for water quality based limited parameters are established in accordance with the Permitting Guidance Document for Implementing Louisiana Surface Water Quality Standards, LDEQ, April 16, 2008.

Site-Specific Consideration(s)

None

X. **Compliance History/DMR Review:**

A Compliance History and DMR Review has been completed for Bercen, Inc.; A Division of Cranston Print Works, Bercen Southern Division covering the time frame of June 30, 2006 through February 1, 2009.

A. DMR Review - the following excursion were reported during the above mentioned time frame:

DATE	PARAMETER	OUTFALL	REPORTED VALUE		PERMIT LIMITS	
			MONTHLY AVERAGE	DAILY MAXIMUM	MONTHLY AVERAGE	DAILY MAXIMUM
8/1/05	Oil & Grease	006	---	15.2 mg/L	---	15.0 mg/L
10/1/05	TOC	004	---	74.7 mg/L	---	50.0 mg/L
3/1/07	BOD_5	003	4.32 lbs/day	---	3.41 lbs/day	---

B. Inspections:

1. An LPDES Compliance Inspection was performed on January 25, 2006. The inspector did not note any areas of concern.

2. An LPDES Compliance Inspection was performed on June 8, 2005. The inspector did not note any areas of concern.

C. Enforcement History (including any open enforcement actions for the facility):

Water - None

Air - None

Solid/Hazardous Waste - Compliance Order HE-C-00-0300 was issued on February 6, 2001.

Radiation - None

XI. "IT" Questions -

This applicant is not required to submit "IT" Questions in accordance with La. R.S. 30:2018(A).

XII. ENDANGERED SPECIES

The receiving waterbody, Subsegment 040304 of the Lake Pontchartrain Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Gulf Sturgeon, which is/are listed as threatened and/or endangered species. This draft permit has been submitted to the FWS for review in accordance with a letter dated 11/17/08 from Rieck (FWS) to Nolan (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and after consultation with FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Gulf Sturgeon. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

XIII. Historic Sites:

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

XIV. Tentative Determination:

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in the application.

XV. Variances:

No requests for variances have been received by this Office.

XVI. Public Notices:

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List